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8 Attorneys for Plaintiff

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA,) No. CR 06-0030 JSW
13 Plaintiff,)
14 v.) STIPULATION AND [PROPOSED]
15 NANCY TAN, JOHNNY LEE TAN, and) ORDER DOCUMENTING
16 KEVIN PUA,) EXCLUSION OF TIME
17 Defendants.)

18 With the agreement of the parties in open court on March 23, 2006, and with the consent
19 of the defendants Nancy Tan, Johnny Lee Tan and Kevin Pua, the Court enters this order
20 (1) setting a hearing on June 15, 2006 at 2:30 p.m. and (2) documenting the exclusion of time
21 under the Speedy Trial Act, 18 U.S.C. § 3161, from March 23, 2006 to June 15, 2006. The
22 parties agree, and the Court finds and holds, as follows:

23 1. All three defendants appeared before the Court with counsel on March 23, 2006.
24 Counsel informed the Court that over 1,000 pages of discovery had already been produced to
25 counsel for the defendants and that several additional boxes of discovery would be produced in
26 the near future. Further, counsel informed the court that the United States had several computers
27 in its possession and would make available to defense counsel imaged copies of the computers
28 containing the most significant evidence identified to date by the United States. Counsel for each

1 of the defendants needs time to review the large amount of discovery to be produced and to be
2 made available by the government. Continuing the case until June 15, 2006 will give counsel
3 some opportunity to accomplish this objective.

4 2. The Court finds that, taking into the account the public interest in the prompt
5 disposition of criminal cases, granting the continuance until June 15, 2006 is necessary based on
6 the complex nature of this case arising from the large amount of discovery and based on effective
7 preparation of counsel. See 18 U.S.C. § 3161(h)(8)(B)(ii) & (iv). Given these circumstances, the
8 Court finds that the ends of justice served by excluding the period from March 23, 2006 to June
9 15, 2006 outweigh the best interest of the public and the defendants in a speedy trial. Id.
10 § 3161(h)(8)(A)

11 3. Accordingly, and with the consent of the defendants, the Court (1) sets a hearing
12 for June 15, 2006 at 2:30 p.m. and (2) orders that the period from March 23, 2006 to June 15,
13 2006 be excluded from Speedy Trial Act calculations under 18 U.S.C. § 3161(h)(8)(A) & (B)(ii)
14 & (iv).

15 || SO STIPULATED.

16 DATED:

/S/

19 | DATED:

/S/
EDWARD HUNG
Attorney for the defendant Nancy Tan

21 DATED:

/S/
SHANA KEATING
Attorney for the defendant Johnny Lee Tan

24 | DATED: _____

/S/
DAVID FERMINO
Attorney for the defendant Kevin Pua

26 | IT IS SO ORDERED

27 DATED: May 11, 2006


JEFFREY S. WHITE
United States District Judge